REMARKS

Claims Status

Claims 1-8 are currently pending, with claims 1 and 8 being in independent form. No new matter has been added. Reconsideration of the application is respectfully requested.

Overview of the Office Action

Claims 1-8 stand rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 7,039,031 ("*Joeressen*") in view of U.S. Pub. No. 2004/0062262 ("*Venteicher*").

Claim 7 stands rejected under 35 U.S.C. §103(a) as unpatentable over *Joeressen* and *Venteicher* in view of U.S. Patent No. 6,249,836 ("*Downs*").

Applicant has carefully considered the Examiner's rejections, and the comments provided in support thereof. For the following reasons, applicant respectfully asserts that all claims now pending in the present application are patentable over the cited art.

Patentability of the Independent Claims Under 35 U.S.C. §103(a)

Independent claim 1 was previously amended to clarify the salient features of the disclosed invention. Thus, independent claim 1 recites, *inter alia*, "said system comprises a plurality of dedicated architecture resource managers ... each ... configured to dialogue with a resource administrator of a dedicated architecture manager of the multi-APN terminal to manage the common resource of said multi-APN terminal based on simultaneous operational processing of said plural dedicated architectures of said multi-APN terminal which are each connected to the corresponding one of said plural communications networks". Independent claim 8 was previously amended to recite, *inter alia*, the steps of "requesting, at one of said process

managers, access to said common resource through a corresponding one of a plurality of dedicated architecture resource managers each associated with a corresponding one of the dedicated architectures; generating, at said one dedicated architecture resource manager, a response after checking said common resource access request". The proffered combination of cited art fails to teach or suggest independent claims 1 and 8.

The Examiner (at pgs. 4 and 6 of the Office Action) has acknowledged that *Joeressen* fails to disclose "generating a request as a function of application being activated on the terminal," as recited in independent claim 1, and *at least* the steps of "requesting, at one of said process managers, access to said common resource through a corresponding one of a plurality of dedicated architecture resource managers each associated with a corresponding one of the dedicated architectures; generating, at said one dedicated architecture resource manager, a response after checking said common resource access request" as recited in independent claim 8, and cites *Venteicher* for these features.

Applicant disagrees, however, that any combination of *Joeressen* and *Venteicher* achieves the subject matter of independent claims 1 and 8. *Joeressen* is directed to the integration of two different communications networks such that a mobile terminal can be operated in both networks (see col. 1, lines 6-9). *Joeressen* (Fig. 5) depicts a network in which a low power radio frequency communications network 2 is integrated with a mobile radio communications network 106.

Joeressen (col. 6, lines 39-44) explains that "[t]he terminal 100 acts as an interface between the mobile and LPRF networks and it operates simultaneously in both. However, concurrent activities and especially concurrent transmission by the mobile terminal 100 in the mobile network 106 and in the LPRF network 2 may cause interference and type approval

difficulties". *Joeressen* (col. 6, lines 50-53) additionally explains that "[t]he LPRF network may be controlled by the mobile terminal acting as a master unit to maintain synchronisation of the two networks and to prevent simultaneous transmission by the mobile terminal 100 in the two networks. The controller 60 in the mobile terminal 100 can synchronise the two networks by shifting the LPRF timing relative to the mobile network". *Joeressen* (col. 6, line 57 to col. 7, line 56) describes "[o]ne possible algorithm for determining an allocation pattern such that the mobile terminal does not transmit simultaneously in both networks".

Joeressen thus teaches transmission sharing between two different radio transceivers that are located within the same mobile terminal, where each transceiver is arranged and configured to communicate with a different communications network at different instances of time. A first time period is allocated for the first radio transceiver and a second time period is allocated for the second radio transceiver. During each time period, the common resources of the mobile terminal 100 are used by the radio transceiver corresponding to the time period in which the transceiver is communicating with a communications network. *Joeressen* thus describes time management to permit non-coincident communication of multiple radio transceivers of a mobile terminal in a way that avoids the occurrence of critical concurrent activities in the terminal (see col. 1, lines 63-65). According to *Joeressen*, these critical concurrent activities "are typically those activities which are difficult or impossible to handle concurrently", such as "simultaneous transmission in both networks" or "simultaneous reception in both networks" (see col. 2, lines 1-5).

In contrast, independent claims 1 and 8 are directed to a system and method for managing a resource in a multi-access point name (APN) terminal for a plurality of architectures each dedicated to a corresponding one of a plurality of communications networks. *Joeressen* fails to teach or suggest the expressly recited subject matter of independent claims 1 and 8.

Independent claim 1 provides a structure of an APN-terminal that permits the separation and isolation of communications of the APN-terminal with the plurality of communications networks. Each of the plural communications networks is dedicated to one of the architectures (15, 15') of the APN-terminal, and each architecture that is dedicated to a specific communications network is completely independent from the other communications networks. Consequently, the APN-terminal is provided with a dedicated architecture manager (13) that centralizes the simultaneous management of each of the dedicated architectures (15, 15') of the APN terminal to process the operation of the terminal when connected to multiple communications networks. The claimed system and method thus provides the ability to manage the dialog between the various elements of the APN-terminal, i.e., the dedicated architecture resource managers (16, 16') and the process manager (17, 17') of each of the dedicated architectures (15, 15'), the dedicated architecture manager (13) and its resource administrator (14), the resource allocator (12) and the radio interface (11) of the APN-terminal (10).

There is no architecture resource manager in the *Joeressen* system that is "configured to dialogue with a resource administrator of a dedicated architecture manager of the multi-APN terminal to manage the common resource of said multi-APN terminal based on simultaneous operational processing of said plural dedicated architectures of said multi-APN terminal which are each connected to the corresponding one of said plural communications networks", as recited in independent claim 1. *Joeressen* also fails to teach or suggest the requesting and generating steps that are implement through a "corresponding one of a plurality of dedicated architecture resource managers each associated with a corresponding one of the dedicated architectures," as recited in independent method claim 8.

Indeed, *Joeressen* (col. 5, lines 22-23; FIG. 4) explains that "the controller 60 in transceiver 40 may also function as the control unit and provide resources to the phone unit 62". However, *Joeressen* (col. 5, lines 23-25) also explains that "[r]esource conflict may arise in this instance and the allocation patterns for the LPRF network may be defined to avoid such conflict". The object of *Joeressen* is thus to avoid resource conflicts. As stated previously, the occurrence of resource conflicts may be avoided using the mobile terminal acting as a master unit to control the LPRF network "to maintain synchronisation of the two networks and to prevent simultaneous transmission by the mobile terminal 100 in the two networks. The controller 60 in the mobile terminal 100 can synchronise the two networks by shifting the LPRF timing relative to the mobile network" (see col. 6, lines 50-53).

In contrast, the claimed invention is directed to specifically managing a common resource in a single multi-APN terminal when the terminal is connected through multiple architectures to multiple corresponding communications networks. Here, the management of resources must account for the dedicated architecture manager (13) that is used to manage each of the dedicated architectures (15, 15'). As explained at pg. 11, lines 11-15 of applicants' specification as originally filed, "[m]anagement by the dedicated architecture manager 13 of the various dedicated architectures 15, 15' each associated with a different communications network enables operation of the terminal 10 as a 'multi-APN' terminal". The claimed invention is thus directed to enabling the functionality of a single multi-APN terminal when it is connected to a plurality of communications networks. *Joeressen* in combination with *Venteicher* fails to achieve such a terminal.

As additionally explained at pg. 2, line 24 to pg. 3, line 6 of the instant specification, the dedicated architecture manager in the single multi-APN terminal assigns each dedicated

architecture to a corresponding communications network. "The autonomy and independent operation of the dedicated architectures of the terminal guarantee mutual confidentiality and security between the communications networks by providing a 'seal' between the various services connected to the terminal.... To maintain the independence of the various communications networks effectively, and because of the autonomy of the various dedicated architectures of a terminal, each dedicated architecture has no view of the operation of the other dedicated architectures of the terminal" (see, e.g., pg. 2, line 17 to pg. 3, line 13 of the specification). A key aspect of the claimed invention is based on the premise that each dedicated architecture within the single multi-APN terminal is provided with no view of the operation of the other dedicated architectures within the same terminal to thereby maintain the independence of the plurality of communications networks. The sharing of datalink resources would compromise the "seal" guaranteed by the autonomous and independent operation of the dedicated architectures of the terminal such that the desired mutual confidentiality and security between the communications networks would be lost. The combination of *Joeressen* and *Venteicher* fails to achieve a system that would encompass these advantageous features.

Venteicher teaches a system and method in which requests for resources associated with data links are shared among multiple devices operating in the same network. There is simply no teaching or suggestion within *Venteicher* of a plurality of dedicated architecture resource managers that are each configured to dialogue with a resource administrator of a dedicated architecture manager to manage common resources in a single multi-APN terminal based on simultaneous, operational processing of the multiple dedicated architectures of the single multi-APN terminal that are each connected to a corresponding one of the plurality of communications

networks, as recited in independent claim 1. There is also no teaching or suggestion in *Venteicher* with respect to the steps of the method of independent claim 8.

The resource administrator of the plural dedicated architecture resource managers that each manage the resources allocated to a respective one of the plural dedicated architectures (15, 15') is described at pg. 11, line 16 to pg. 13, line 5 of the specification as originally filed. This resource administrator dialogs with the plural dedicated architecture resource managers to advantageously manage access to a common resource in a single multi-APN terminal based on simultaneous operational processing of the plural dedicated architectures of the single multi-APN terminal. The combination of *Joeressen* and *Venteicher* fails to teach or suggest this claimed feature.

The devices of *Venteicher* are controlled in association with a single communications network. There is no attempt in the *Venteicher* system to ensure that the devices do not communicate with each other in this single network to thereby maintain a high level of security. *Joeressen* discloses a system in which each transceiver is arranged and configured to non-overlappingly communicate with a different communications network at different instances of time. The combination of *Joeressen* and *Venteicher* fails to teach or suggest applicant's claimed invention.

By virtue of the above-discussed differences between the recitations of independent claims 1 and 8 and the teachings of *Joeressen* in combination with *Venteicher*, and the lack of any clear motivation for modifying the reference teachings to achieve applicant's claimed invention, independent claims 1 and 8 are deemed to be patentable over the combination of *Joeressen* and *Venteicher* under 35 U.S.C. §103.

Patentability of Dependent Claim 7 under 35 U.S.C. §103(a)

The Examiner (at pg. 9 of the Office Action) has acknowledged that the combination of *Joeressen* and *Venteicher* fails to disclose "wherein each of said plural dedicated architecture resource managers includes a resource correspondence table for defining the resource corresponding to the application activated on said multi-APN terminal," as recited in dependent claim 7, and cites *Downs* for this feature.

Applicants disagree, however, that any combination of *Joeressen*, *Venteicher* and/or *Downs* achieves the subject matter of dependent claim 7. There is nothing in *Downs* to cure the above-noted deficiencies in *Joeressen* and *Venteicher* concerning the lack of teachings of, *inter alia*, the claim 1 recited architecture resource manager that is configured to dialogue with a resource administrator of a dedicated architecture manager of a multi-APN terminal.

The combination of *Joeressen*, *Venteicher* and/or *Downs* therefore fails to teach or suggest the features recited in independent claim 1, let alone in dependent claim 7. Dependent claim 7 is accordingly likewise deemed to be patentable over the combination of *Joeressen*, *Venteicher* and/or *Downs*.

Dependent Claims

In view of the patentability of independent claim 1 for the reasons presented above, each of dependent claims 2-7 is respectfully deemed to be patentable therewith over the prior art. Moreover, each of these dependent claims includes features which serve to still further distinguish the claimed invention over the applied art.

Conclusion

Based on all of the above, applicants submit that the present application is now in full and proper condition for allowance. Prompt and favorable action to this effect, and early passage of the application to issue, are once more solicited.

Should the Examiner have any comments, questions, suggestions or objections, the Examiner is respectfully requested to telephone the undersigned to facilitate an early resolution of any outstanding issues.

It is believed that no fees or charges are required at this time in connection with the present application. However, if any fees or charges are required at this time, they may be charged to our Patent and Trademark Office Deposit Account No. 03-2412.

Respectfully submitted,
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